

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CELTIC WOMAN LTD.,

Plaintiff,

V.

CELTIC THUNDER LTD.,)
 CELTIC MAN LTD., SHARON)
 BROWNE, WLIW LLC,)
 ALIGN ENTERTAINMENT GROUP LLC,)
 and GUSTAVO SAGASTUME,)

Defendants.

FILED ELECTRONICALLY

Civil Action No. 08-CV-0066 (TPG) (HP)

DECLARATION OF PETER A. HERBERT

1. I am a partner of Hinckley, Allen & Snyder LLP, attorneys for Plaintiff Celtic Woman Ltd. I submit this declaration on personal knowledge and in further support of Plaintiff's Motion for Preliminary Injunction.

2. Attached ad Exhibit 1 is a true and accurate copy of Sharon Browne's biographical material contained on the Celtic Thunder website bearing the date January 31, 2008.

3. Attached as Exhibit 2 is a true and accurate copy of a Borders website page 1 bearing the date February 7, 2008.

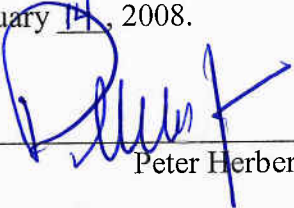
4. Attached as Exhibit 3 is a true and accurate copy of YAHOO website pages 1-2 bearing the date January 31, 2008.

5. Attached as Exhibit 4 is a true and accurate copy of CD Universe website pages 1-3 bearing the date February 13, 2008.

6. Attached as Exhibit 5 is a true and accurate copy of CD Universe website pages 1-2 bearing the date February 13, 2008.
7. Attached as Exhibit 6 is a true and accurate copy of Elderly.com website page 1 bearing the date February 4, 2008.
8. Attached as Exhibit 7 is a true and accurate copy of Amazon.com website pages 1-5 bearing the date January 30, 2008.
9. Attached as Exhibit 8 is a true and accurate copy of Amazon.ca website pages 1-3 bearing the date February 4, 2008.
10. Attached as Exhibit 9 is a true and accurate copy of Amazon.co.jp website pages 1-4 bearing the date February 4, 2008.
11. Attached as Exhibit 10 is a true and accurate copy of Reuters.com website pages 1-3 bearing the date January 31, 2008.
12. Attached as Exhibit 11 is a true and accurate copy of Regorecords.com website pages 1-6 bearing the date February 13, 2008.
13. Attached as Exhibit 12 is a true and accurate copy of Amazon.com website pages 1-4 bearing the date January 30, 2008.
14. Attached as Exhibit 13 is a true and accurate copy of Regorecords.com website pages 1-3 bearing the date February 13, 2008.
15. Attached as Exhibit 14 is a true and accurate copy of the outer packaging of the videocassette (VHS) of the theatrical performance entitled "Riverdance."
16. Attached as Exhibit 15 is a true and accurate copy of the outer packaging of the DVD entitled "The Best of Riverdance," featuring among others, the star Michael Flatley.

17. Attached as Exhibit 16 is a true and accurate copy of the outer packaging of the DVD of the performance of Michael Flatley's subsequent theatrical production entitled "Lord of the Dance."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 14, 2008.



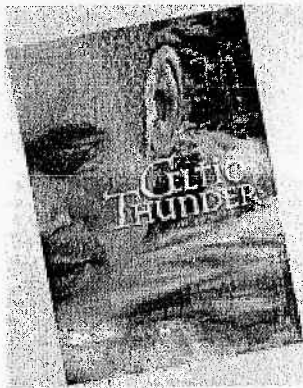
Peter Herbert

on CD

on DVD

on TV

on Tour

**The Show
TV Broadcasts****Products
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Celtic Thunder****Creatives****Photos
Media**

Creatives

Sharon Browne has been working in the music business for 20 years. Her management buy in 1996 of K-Tel in Ireland created what was to become Ireland's Premier Irish Music Label – Celtic Collections, an independent and Irish owned label.

Her focus moved to representing the catalogues of big Irish names such as Phil Coulter, The Dubliners, The Wolfetones, The Furey Bros & Davey Arthur, Bagatelle, Paddy Reilly, Jim Mc Cann etc. throughout the world.



Sharon further developed the label by venturing into more Contemporary Irish music and World music releasing albums of Clannad, Altan and Bohinta and began investing in young Irish female vocalists such as Chloe, Meav, Lisa, Aine Furey, Aoife, Rua and others.

Sharon Browne is the Creator and Producer of CELTIC WOMAN. She has loved the change in her career, moving into creating and producing Television Shows and Live Tours along with the CD's and DVD's she was used to working on. Sharon is married to Declan and they have 3 sons, Alex, Matthew and Dudley.

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BORDERS.

Feb 07, 2008 17:44:02

Celtic Man: From the Producers of Celtic Woman Celtic Thunder



CELTIC MAN

\$19.99

**Not Yet
Published**

Prices may vary by store. See your local store for the most up-to-date pricing.

DVD

February 2008

Avg Customer Rating:

Be the first to rate this item

about this edition

UPC: 602517624511

BINC: 9419122

Original Release Date: February 2008

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Press Release

Source: Celtic Thunder Limited

Creator of Best-Selling Irish Musical Phenomenon 'Celtic Woman' Launches Brand-New Show

Tuesday December 11, 11:13 am ET

SINGING SENSATION "CELTIC MAN" TO BE FEATURED ON PUBLIC TELEVISION SPECIAL, CELTIC THUNDER, AIRING IN MARCH 2008

NEW YORK, Dec. 11 /PRNewswire/ -- Sharon Browne, creator and former producer of the chart-topping Irish musical ensemble Celtic Woman, will introduce her brand-new show, entitled Celtic Man in Celtic Thunder, which features five male vocalists, collectively called Celtic Man, to U.S. audiences with a public television special to be broadcast nationally in March 2008. The special will be distributed by WLIW New York.

Top Stories

- [Wall Street Falls Amid Economic Worries](#) - AP (10:33 am)
- [MBIA Loses \\$2.3 Billion on Write-Downs](#) - AP (10:08 am)
- [Consumer Spending Slowed in December](#) - AP (10:14 am)
- [P&G Lifts Outlook on Strong 2nd Quarter](#) - AP (10:51 am)

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(Photo: <http://www.newscom.com/cgi-bin/prnh/20071211/NYTU068>)

Source: Celtic Thunder Limited



- Celtic Man in Celtic Thunder.
- [Click Here to Download Image](#)

For Celtic Thunder, Browne has teamed up with Grammy-nominated Irish songwriting and composing veteran Phil Coulter to produce a show that includes an eclectic mix of songs ranging from the traditional "Mountains of Mourne" and "Come By the Hills" to international hits such as "Brothers in Arms" and "Desperado," as well as original compositions by Coulter, who has written hits for Elvis Presley ("My Boy") and the Bay City Rollers, and performed with Van Morrison, Tom Jones, and the Rolling Stones. The ensemble numbers in Celtic Thunder reflect the power of the soloists, who range in age from 14 to 40, and feature songs that celebrate a common Celtic

heritage.

• [Most-viewed articles](#)

"My concept for Celtic Man was to feature real men of different ages from Ireland and Scotland," says Browne. "The guys -- Damien McGinty, Keith Harkin, Ryan Kelly, Paul Byrom, and George Donaldson -- are a real range of Celts. These men are good-looking in a not-too-pretty way, strong, silent, quietly powerful, and just a little threatening. There are enough boy bands out there -- it's time for some real men!"

Browne is a 20-year music business veteran who, prior to Celtic Thunder, launched Ireland's premier music label Celtic Collections in 1996, and developed and produced the phenomenally successful Celtic Woman show, which featured five stunning female soloists.

Celtic Man in Celtic Thunder was filmed in the Helix in Dublin in August 2007. A CD/DVD of the show will be distributed in the U.S. by Universal's Decca label beginning February 26th, 2008. In addition, a 50-city tour is scheduled for Fall 2008. Celtic Man in Celtic Thunder, will air on local public television stations beginning March 2008, and viewers who support the stations during their fundraising campaign will have the first opportunity to get tickets for the Fall tour, as well as a special edition of the CD and DVD with bonus material.

www.celticman.net

For more information, please contact:
Pamela Murphy at Align Entertainment Group
Office 646.596.8700
Cell 917.498.0802
pamela@aligneg.com

Source: Celtic Thunder Limited

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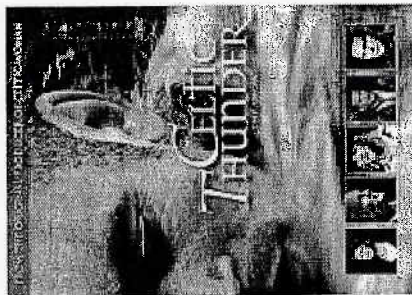
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Large Front

Celtic Thunder - From The Producers Of Celtic Woman Celtic Thunder DVD Celtic Thunder

Regular Price: \$16.29

Sale Price: **\$14.79**

PRE-ORDER NOW

ADD TO WISH LIST

Scheduled to release Tuesday, March 04, 2008
Place your order today and be one of the first to receive this product when it arrives.

Format: DVD

Email a Friend

Detailed Information

List Price	\$19.98 (You save \$5.19)
Category	Pop Music Videos, Concert, Classical, Music Video, Music (General), World, Celtic
Studio	Universal Music & Video Distribution
CD Universe Part#	7616976
Catalog#	1
Discs	1
Street Date	Mar 04, 2008
Rating	Not Rated
Movie Details	Color

Current Top Sellers

1. [Assassination Of Jesse James](#)
 2. [Portrait In Black/Madame X](#) Widescreen
 3. [Tammy And The Bachelor/ Tammy Tell Me True/ Tammy](#)
 4. [Jeff Dunham - Spark Of Insanity](#) Widescreen
 5. [Elizabeth: The Golden Age](#)
- > All Time Top Sellers

New Releases

This Week

1. [In The Shadow Of The Moon](#)
2. [Wwe - Stone Cold Steve Austin's Life & Legacy](#) Full Frame
3. [Tyler Perry's What's Done In The Dark](#)
4. [Why Did I Get Married](#) Widescreen

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Notes

Dolby Digital 5.1 Re

Description

Singer/songwriter Phil Coulter and CELTIC WOMAN producer Sharon Browne team up for this celebration of song. Some powerful vocalists bring classic tracks such as Dire Straits' "Brothers in Arms" and "Nights in White Satin" by the Moody Blues to life. The tracklisting also includes standards such as "The Raggle Taggle Gypsy" and "Come By the Hills."

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Featured Bargain



Mr. Bean's Holiday

Our Price: ~~DVD \$19.23~~

You Save: \$10.75

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5. [Why Did I Get Married](#) Full Frame Next Week
1. [American Gangster](#) Widescreen Unrated
2. [La Fea Mas Bella](#)
3. [MR. Warmth - The Don Rickles Project](#) Unrated
4. [Lust, Caution](#)
5. [For The Bible Tells Me So](#)

Top Future Releases

1. [In The Shadow Of The Moon](#)
2. [American Gangster](#) Widescreen Unrated
3. [La Fea Mas Bella](#)
4. [MR. Warmth - The Don Rickles Project](#) Unrated
5. [Firm - Balance Trainer](#)

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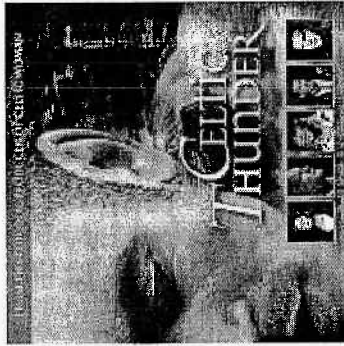
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Large Front

Celtic Thunder CD

Regular Price: \$15.05

Sale Price: **\$14.80** Save \$0.25

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 March 04, 2008**

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Format: CD

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 4. [Hardcastle 5](#)
Paul Hardcastle
 5. [The Scarecrow](#)
Avantasia
- > [All Time Top Sellers](#)

New Releases

This Week

1. [Phenomenon](#)
UFO
 2. [Thriller \(25th Anniversary Edition\)](#)
Michael Jackson
 3. [Force It](#)
UFO
 4. [The Phlorescent Leech & Eddie/Flo & Eddie](#)
Flo & Eddie
 5. [No Heavy Petting](#)
UFO
- Next Week
1. [Led Zeppelin - Song Remains The Same](#)
Led Zeppelin
 2. [Song Remains The Same](#)
Led Zeppelin

Detailed Information

List Price \$18.98 (You save \$4.18)

Category [Rock/Pop](#), [Rock](#), [International](#), [Vocal](#), [World](#), [Celtic](#)

Label [Decca \(USA\)](#)

Orig Year 2008

CD Universe Part# 7612214

Catalog# 1

Discs 1

Street Date Mar 04, 2008

Studio/Live Studio

Mono/Stereo Stereo

Recording Time 51 minutes

Track Listing

Song Title

1. [Heartland](#)
2. [Mountains Of Mourne](#)

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The Dictators**

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4. Come By The Hills
5. Remember Me, Recuerde Me
6. Desperado
7. Steal Away
8. Island, The
9. Old Man, The
10. Brothers In Arms
11. Cal/Local Hero
12. Lauren & I
13. She
14. Ireland's Call
15. Puppy Love

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Led Zeppelin

3. [Song Remains The Same](#)
Led Zeppelin
4. [Johnny B. Goode: His Complete '50s Chess Recording](#)
Chuck Berry
5. [Dancing Sessions](#)
Maynard Ferguson

Top Future Releases

1. [Plastic Green Head \(Re-Mastered\)](#)
Trouble
2. [Dog Eat Dog World](#)
Chris Hicks
3. [Backwoods Barbie](#)
Dolly Parton
4. [The Orchard](#)
Lizz Wright
5. [Renacer](#)
Kevin Ceballo

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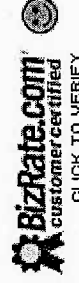
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CELTIC MAN IN CELTIC THUNDER, THE SHOW

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DVD - CELTIC MAN IN CELTIC THUNDER, THE SHOW

From the producer of "Celtic Woman," Sharon Browne. She has teamed up with Phil Coulter to produce a show with an eclectic mix of songs, from the traditional "Mountains of Mourne," to "Desperado," along with some of Coulter's originals. The vocal ensemble ranges in age from 14 to 40. These songs celebrate a common Celtic heritage. As seen on PBS. Release date 02/26/2008

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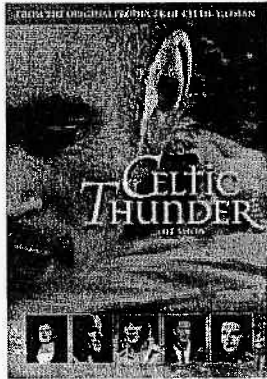
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From the Producers of Celtic Woman, Celtic Thunder (2008)

Starring: Celtic Thunder Rating **UNRATED**

No customer reviews yet. [Be the first.](#)

List Price: ~~\$49.98~~

Price: **\$17.99** & eligible for **FREE Super Saver Shipping** on orders over \$25. [Details](#)

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Format: **DVD**

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- Valentine's Day:** No matter how you feel about the holiday, you can [save up to 35%](#) on the movies that mean Valentine's to you.

Product Details

Actors: [Celtic Thunder](#)

Format: NTSC, Dolby

Language: English

Region: Region 1 (U.S. and Canada only. Read more about [DVD formats](#).)

Number of discs: 1

Rating **UNRATED**

Studio: Celtic Thunder Ltd

DVD Release Date: February 26, 2008

Average Customer Review: No customer reviews yet. [Be the first.](#)

ASIN: B0012RLWU2

Amazon.com Sales Rank: #59,168 in Movies & TV (See [Bestsellers in Movies & TV](#))

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#97 in [Movies & TV](#) > [Sports](#) > [Basketball](#) > [Teams](#) > [Boston Celtics](#)

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For more information about "From the Producers of Celtic Woman, Celtic Thunder" [visit the Internet Movie Database \(IMDb\)](#)

Theatrical Release Information

Editorial Reviews

Product Description

THE ORIGINAL PRODUCER OF CELTIC WOMAN BRING US CELTIC THUNDER For Celtic Thunder, Sharon Browne (Producer of the original Celtic Woman show) has teamed up with Grammy-nominated Irish songwriting and composing veteran Phil Coulter to produce a show that includes an eclectic mix of songs ranging from the traditional "Mountains of Mourne" and "Come By the Hills" to international hits such as "Brothers in Arms" and "Desperado," as well as original compositions by Coulter, who has written hits for Elvis Presley ("My Boy") and the Bay City Rollers, and performed with Van Morrison, Tom Jones, and the Rolling Stones. The ensemble numbers in Celtic Thunder reflect the power of the vocalists, who range in age from 14 to 40, and feature songs that celebrate a common Celtic heritage.

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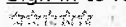
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This product's forum (0 discussions)

Discussion

Replies Latest Post

Related forums

[celtic music](#) (4 discussions)

No discussions yet

Ask questions, Share opinions, Gain insight

Start a new discussion

Topic:

Active discussions in related forums

Discussion	Replies	Latest Post
<input checked="" type="checkbox"/> celtic music Have You Seen A Christmas Celebration DVD yet?	5	5 days ago
<input checked="" type="checkbox"/> celtic music Favorite Celtic Woman artist	18	15 days ago

Product Information from the Amapedia Community Beta [\(What's this?\)](#)

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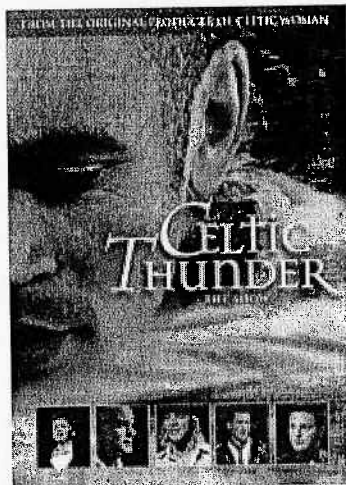
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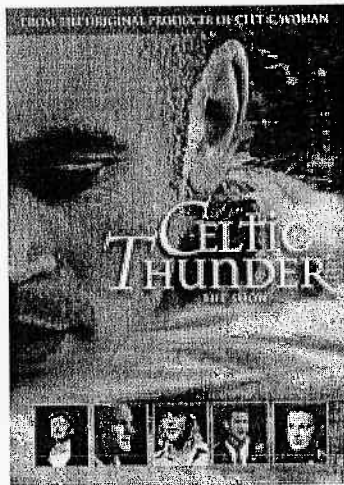
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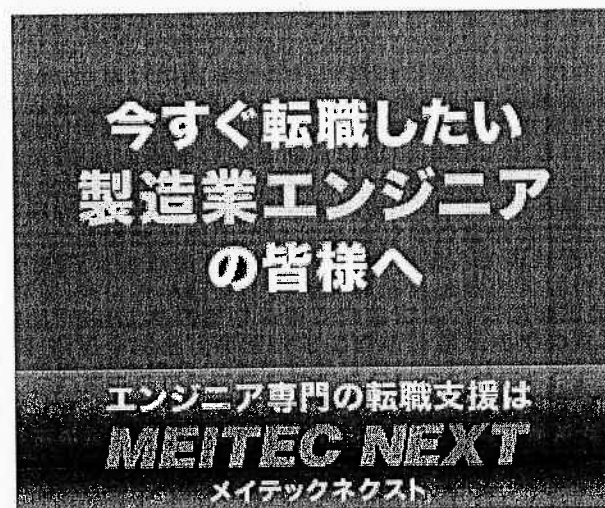
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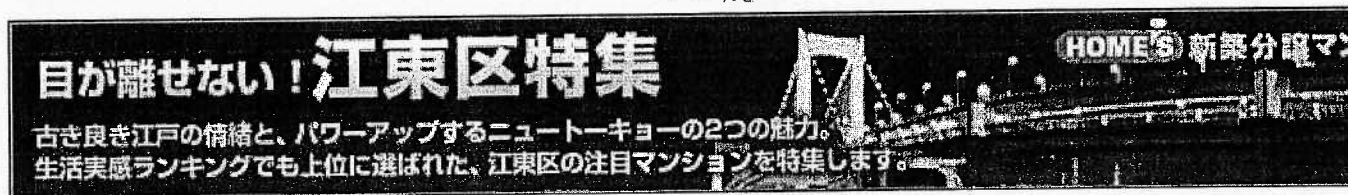
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Creator of Best-Selling Irish Musical Phenomenon 'Celtic Woman' Launches Brand-New...

Tue Dec 11, 2007 11:13am EST

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Creator of Best-Selling Irish Musical Phenomenon 'Celtic Woman' Launches
Brand-New Show
SINGING SENSATION "CELTIC MAN" TO BE FEATURED ON PUBLIC TELEVISION SPECIAL,
CELTIC THUNDER, AIRING IN MARCH 2008

NEW YORK, Dec. 11 /PRNewswire/ -- Sharon Browne, creator and former producer of the chart-topping Irish musical ensemble Celtic Woman, will introduce her brand-new show, entitled Celtic Man in Celtic Thunder, which features five male vocalists, collectively called Celtic Man, to U.S. audiences with a public television special to be broadcast nationally in March 2008. The special will be distributed by WLIW New York.

(Photo: www.newscom.com/cgi-bin/prnh/20071211/NYTU068)

For Celtic Thunder, Browne has teamed up with Grammy-nominated Irish songwriting and composing veteran Phil Coulter to produce a show that includes an eclectic mix of songs ranging from the traditional "Mountains of Mourne" and "Come By the Hills" to international hits such as "Brothers in Arms" and "Desperado," as well as original compositions by Coulter, who has written hits for Elvis Presley ("My Boy") and the Bay City Rollers, and performed with Van Morrison, Tom Jones, and the Rolling Stones. The ensemble numbers in Celtic Thunder reflect the power of the soloists, who range in age from 14 to 40, and feature songs that celebrate a common Celtic heritage.

"My concept for Celtic Man was to feature real men of different ages from Ireland and Scotland," says Browne. "The guys -- Damien McGinty, Keith Harkin, Ryan Kelly, Paul Byrom, and George Donaldson -- are a real range of Celts. These men are good-looking in a not-too-pretty way, strong, silent, quietly powerful, and just a little threatening. There are enough boy bands out there -- it's time for some real men!"

Browne is a 20-year music business veteran who, prior to Celtic Thunder, launched Ireland's premier music label Celtic Collections in 1996, and developed and produced the phenomenally successful Celtic Woman show, which featured five stunning female soloists.

Celtic Man in Celtic Thunder was filmed in the Helix in Dublin in August 2007. A CD/DVD of the show will be distributed in the U.S. by Universal's Decca label beginning February 26th, 2008. In addition, a 50-city tour is scheduled for Fall 2008. Celtic Man in Celtic Thunder, will air on local public television stations beginning March 2008, and viewers who support the stations during their fundraising campaign will have the first opportunity to get tickets for the Fall tour, as well as a special edition of the CD and DVD with bonus material.

www.celticman.net

For more information, please contact:
Pamela Murphy at Align Entertainment Group
Office 646.596.8700
Cell 917.498.0802
pamela@aligneg.com

SOURCE Celtic Thunder Limited

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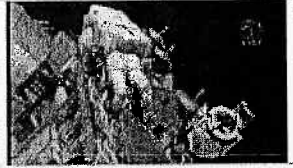
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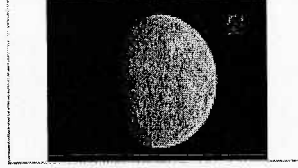
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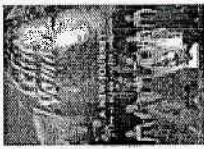
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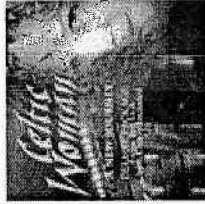


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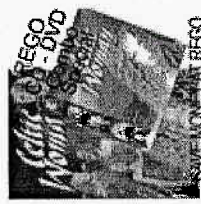


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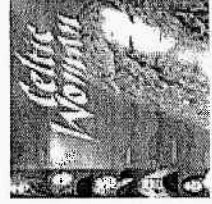
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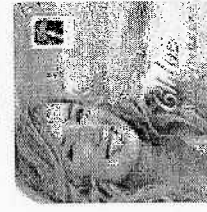
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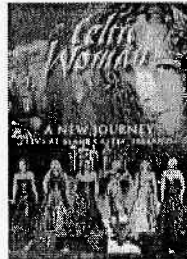
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DVD ~ Chloe Agnew

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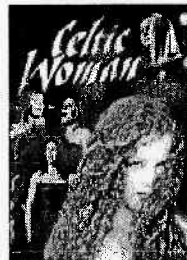
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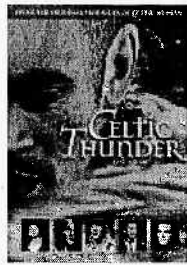
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 Steal Away All
 Remember Me Paul Byrom
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 Desperado Ryan Kelly

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That's a Woman Paul / Ryan
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BONUS TRACKS
Yesterday's Men George Donaldson

From Famed Producer Sharon Browne Comes
Celtic Thunder

Damian McGinty

He has loved singing from a young age and won his first singing competition at the age of 10.

Keith Harkin

Keith is a talented Songwriter and excellent Guitar player as well as an amazing singer.

Ryan Kelly

Ryan has performed alongside Westlife, Girls Aloud and Simply Red in the televised 'Need Live Charity Concert' at the Odyssey in Belfast to an audience of over 8,000.

Paul Byrom

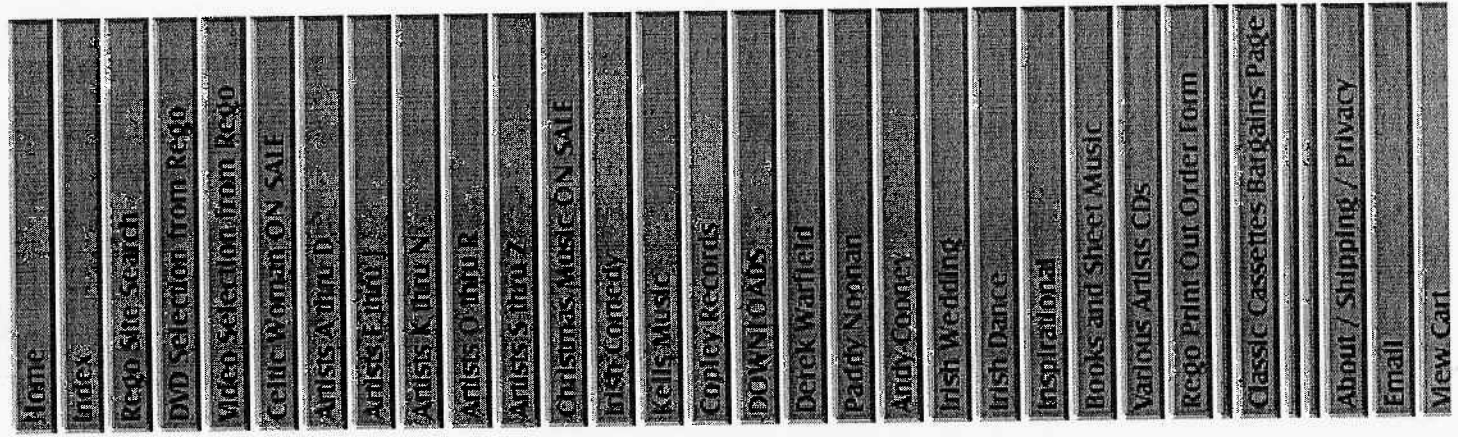
Two years ago Paul got to record the album of his dreams with a 54 piece orchestra. Velvet and covered songs from the American Matinee era. Much to his delight it reached the classical charts.

George Donaldson

George has played alongside many folk musicians and singers, including Jim McCann from the Dubliners and has performed at the famous Glasgow Barrowlands.

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THE MAGIC, ENERGY AND PASSION ...

Riverdance

a journey



THE STORY BEHIND
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PHENOMENON THAT IS RIVERDANCE

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Something magical happened at The Point Theatre in Dublin on April 30th 1994, when a 7 minute interval performance piece for the Eurovision Song Concert astonished the World.

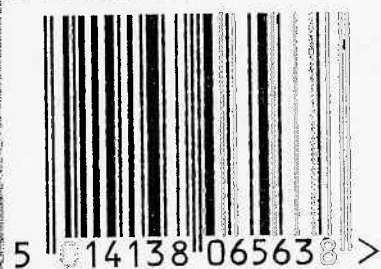
RIVERDANCE - A JOURNEY has captured the magic, the energy and the passion of what has gone on to become the music and dance phenomenon of the decade.

Offering a unique insight into the story behind the creation and making of RIVERDANCE, this special video follows the show from its beginnings in Dublin, on to London and then all the way to New York as the show becomes an enormous International box office hit.

Featuring all the passion, power and intrigue both on and off the stage, you will be entertained and enthralled by this magical experience.



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Length: 73 mins approx



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BREANDÁN DE GALLAÍ

COMPOSED BY BILL WHELAN
PRODUCED BY MOYA DOHERTY
DIRECTED BY JOHN MCCOLGAN



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THE BEST OF

Riverdance

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"Of all of the performances to emerge from Ireland in the past decade in rock, music, theatre and film – nothing has carried the energy, the sensuality and the spectacle of Riverdance."

Includes 18 of the all-time best performances of *Riverdance* from its extraordinary beginnings at the Point Theatre, Dublin, with original stars Michael Flatley and Jean Butler, through its phenomenal success in Radio City Music Hall, New York to its latest live recording in Geneva. *Riverdance* boasts an international cast featuring the remarkable Riverdance Irish Dance Troupe, the cream of Irish musicians in the Riverdance Band and a spectacular array of talent from Spain, Russia and America, performing to the magic of Bill Whelan's music. More electrifying than ever, this DVD is a treasure for Riverdance fans worldwide!

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Never before seen footage of the Riverdance backstage crew in action

RIVERDANCE

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Produced by Tyrone Productions

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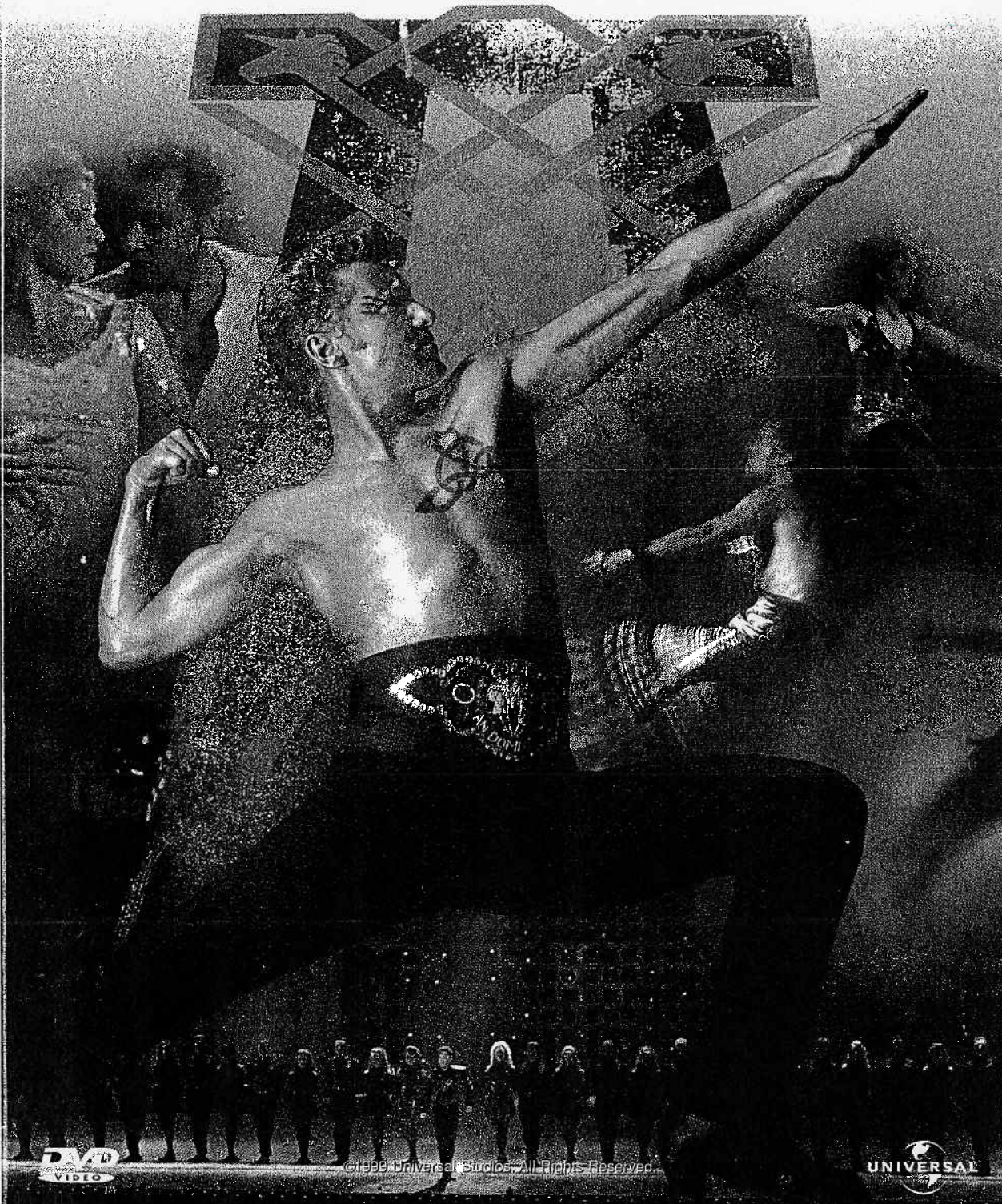


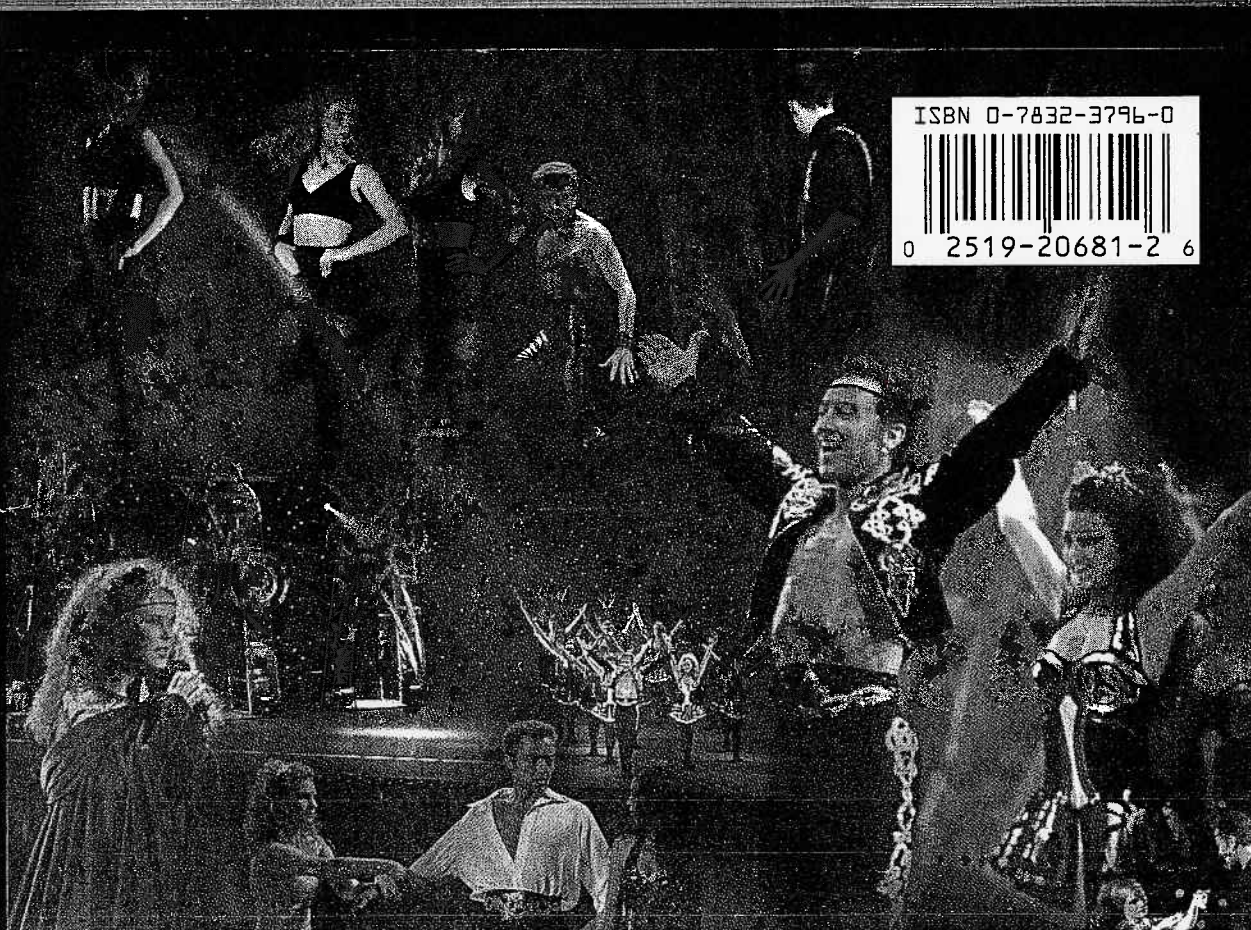
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